

Rocky Flats Plant Interim Community Relations Plan (Draft)

Purpose

During the February 1990 public hearing on the Federal Facility Agreement and Consent Order, also known as the Interagency Agreement (IAG), several commenters requested the development of an interim community relations plan. EG&G Rocky Flats, Inc prepared the **Rocky Flats Plant Interim Community Relations Plan** to formalize community relations activities until a final plan is implemented early in 1991.

The interim plan has 3 major objectives

- o Inform and involve the public in environmental cleanup work at Rocky Flats,
- o Provide mechanisms for and encourage the public to take part in the process, and
- o Provide a focus and a forum to resolve conflict arising from proposed cleanup activities

Although this is only an interim plan, it conforms with all requirements for public involvement as presented in the Comprehensive Environmental Response, Compensation and Liability Act, (CERCLA) and the Resource Conservation and Recovery Act (RCRA). Further, the interim plan incorporates all the requirements for community relations as provided in the IAG. Changes to the interim plan will be considered if they are necessary to reflect the needs and desires of the community regarding information exchange and public involvement.

Background

The Rocky Flats Plant is part of a nationwide nuclear weapons research, development, production and decommissioning complex. It is the nation's sole producer of plutonium components for nuclear weapons. The plant is located on 6489 acres of federally-owned land located approximately 16 miles northwest of downtown Denver. It is almost equal distance from the cities of Boulder, Golden and Arvada. Several other communities are located nearby, including Louisville, Lafayette, Broomfield, Northglenn, Thornton and Westminster. The 1990 estimated population within a 50-mile radius of the plant is approximately 1.9 million.

The site is directly upstream of two major metropolitan drinking water supplies, the Great Western Reservoir and Standley Lake, and some groundwater drinking and agricultural water supply sources.

Production of nuclear weapons components, reprocessing of radioactive substances, nuclear metals fabrication and research and development are the primary functions of the facility. Beginning with plant operations in 1952, materials defined as hazardous substances, pollutants and contaminants by CERCLA and materials defined as hazardous waste and hazardous constituents by RCRA and the Colorado Hazardous Waste Act (CHWA) have been produced and managed at the site. Some of these materials have been detected in water and soil at the site. Groundwater, soil, sediments, surface water and air pathways can provide routes for migration of these contaminants from the facility into the environment.

Environmental cleanup activities at the site began in 1972 with the appointment of 10 managers to study the plant's environmental efforts. In 1985 the U S Department of Energy completed the Comprehensive Environmental Assessment and Response Program, which investigated 80 potential environmental problems and identified areas that qualified for inclusion on the Superfund National Priorities List (NPL). The Rocky Flats Plant site was placed on the NPL in September 1989.

The Draft Federal Facility Agreement and Consent Order among the U S Environmental Protection Agency (EPA), the U S Department of Energy (DOE) and the Colorado Department of Health (CDH) was signed in December 1989. It is now being reviewed in light of public comments received and will be modified as agreed by the signing parties. The IAG provides for the development of a formal community relations plan that will be based on information gathered during extensive community interviews.

A draft Community Interview Plan was submitted to EPA and CDH in January 1990 and subsequently was approved. Interviews of more than 80 federal and state elected officials, local officials, representatives of federal, state and local agencies, members of community, environmental and citizens' organizations, private citizens, and media representatives began in June 1990. A draft Rocky Flats Plant Community Relations Plan will be presented to EPA and CDH for review in September 1990 with a public comment period scheduled to begin in November 1990. The final plan will be available in April 1991.

This interim plan was prepared and will be implemented in response to comments made during the draft IAG public comment period and discussions with EPA Region VIII, the State of Colorado, the Rocky Flats Environmental Monitoring Council and the Rocky Flats Cleanup Commission.

Key Community Concerns

As stated previously, issues and concerns identified through community interviews will provide the basis for the Rocky Flats Plant Community Relations Plan. In the absence of this information to date, comments and recommendations from advisory groups such as the Rocky Flats Environmental Monitoring Council and the Rocky Flats Cleanup Commission indicate that community concerns can be grouped into two broad areas:

- o Past waste disposal practices resulting in environmental contamination, and
- o Current waste management practices

The cleanup of past waste disposal sites that are sources of contamination was formerly addressed in 1986 through a compliance agreement among EPA, DOE and CDH. The IAG, which replaces the 1986 compliance agreement, reflects recent federal requirements and a clarification of priorities based on increased knowledge from ongoing investigations. The U S Department of Energy has prioritized problem sites, and technical investigations to define the nature and extent of contamination at these sites are underway.

Current waste management practices are regulated under the Resource Conservation and Recovery Act (RCRA), and permits for storage, treatment and disposal activities are authorized by the act. Permit applications for many units on site have been filed with EPA and CDH.

Underlying these concerns is the public need for a credible source of information regarding waste management and environmental cleanup. Moreover, the public wants assurances of their continued involvement in the cleanup process. EG&G Rocky Flats, Inc. has three major goals that address these concerns:

- o Ensure that the plant is operated in a manner that protects human health and the environment,
- o Ensure that appropriate, adequate and timely cleanup occurs where contamination exists from past practices, and
- o Inform and involve the public in environmental issues at the site.

The need to achieve the third goal is particularly acute, judging from comments offered at the IAG public hearing:

"If the parties want the public trust, then I say that the parties should first trust the public. Prove to us that the parties are listening."

"Demonstrate to us that our words are not falling on deaf ears."

The Rocky Flats Plant Interim Community Relations Plan is designed to address these issues directly and to initiate, at a minimum, the community relations activities outlined in CERCLA, RCRA and the IAG.

Information Repositories

Information repositories have been established at the following locations so that documents about activities at the Rocky Flats Plant are readily available for public review:

U.S. Environmental Protection Agency Region VIII Library
999 18th Street, Suite 215
Denver, CO 80202-2405
(303) 293-1444

Colorado Department of Health
4210 East 11th Avenue, Room 351
Denver, CO 80220
(303) 331-4850

Rocky Flats Environmental Monitoring Council
1536 Cole Boulevard, Suite 150
Golden, CO 80401
(303) 232-1966

DOE Rocky Flats Public Reading Room
Front Range Community College Library
3645 West 112th Avenue
Westminster, CO 80030
(303) 466-8811, ext 504

The information repositories provide general and specific information related to activities at the plant. The IAG specifies which types of documents the Department of Energy is required to supply to the information repositories. The list is included as Appendix A.

The IAG also requires that a copy of the Administrative Record be available to the public at or near the site and at a central location. Copies of the Administrative Record, which is the information upon which the selection of a response action is based, are currently available on microfiche at the four information repositories. Press releases, newspaper clippings, fact sheets and journal articles are also available at the information repositories.

Additional information repositories may be established at other locations in the area as needed.

Mailing List

A comprehensive mailing list of interested parties is maintained by the Communications Department of EG&G Rocky Flats, Inc. This list will be coordinated and shared with the EPA and the CDH Rocky Flats Program Unit. EPA, CDH, DOE and EG&G Rocky Flats, Inc. will use this mailing list to distribute periodic information about Rocky Flats to interested parties. Direct mailings will usually be in the form of a news release, a fact sheet, an information update or a public meeting or hearing announcement.

Public Information Meetings

The IAG provides an ambitious schedule for public participation. It requires that public information meetings be held at least four times per year by the agencies that signed the agreement. These meetings will update the public on permitting and cleanup activities and apprise them of upcoming activities.

Additional meetings will be scheduled as needed to describe progress and compliance with the IAG. Separate meetings for complex issues or issues that command a high level of public interest will also be scheduled.

As specified in the IAG, the following types of documents are subject to public comment and review

- o Draft Colorado Hazardous Waste Act/RCRA Permits for Treatment, Storage and Disposal Units
 - o Draft Hazardous and Solid Waste Amendment Act Permits for Corrective Action at Solid Waste Management Units
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- o Closure Plans
 - o Interim Measures and Interim Remedial Actions
 - o Community Relations Plan
 - o Draft Proposed Plans
 - o Plan for the Prevention of Contaminant Dispersion
 - o Workplan Designed to Implement Discharge Limits for Radionuclides

The IAG sets out a schedule for the submittal of draft and final documents, including those that will be available for public comment

A transcript of all public comment meetings will be made by a court reporter. The transcript will be placed in the information repositories and will be made part of the Administrative Record. Additional copies of the transcript will be available to any interested party upon request to the Community Relations Plan Information Coordinator.

A responsiveness summary will be prepared following each public comment meeting. The responsiveness summary will also be placed in the information repositories and will become part of the Administrative Record.

Notification

In order for these meetings to be useful and successful, the public must be notified in advance so they can plan to attend. Toward this end, prompt and thorough notification is essential. The public will be notified by display advertising, radio announcements and direct mail to those on the Rocky Flats mailing list.

Display advertising announcing each meeting will appear in the Denver Post, the Rocky Mountain News and the Boulder Daily Camera at least two weeks prior to the meeting. Deadlines permitting, two-week notice will also be provided to the Arvada and Westminster Sentinels, which are published weekly.

The display ads will be submitted concurrently with a press release that outlines the purpose of the meeting and the issues that will be under consideration. Also, a copy of the display

advertising and the press release will be mailed to individuals and organizations on the mailing list prior to the meeting. Arrangements for airing radio announcements about the meeting will be made with large radio stations such as KOA and KCFR.

Technical Assistance Grants

The Technical Assistance Grant (TAG) program, provided for in CERCLA, is a federal government mechanism for citizen groups to obtain expert assistance in reviewing technical environmental restoration information. The program allows for greater public participation in the document review process than might otherwise be possible. A TAG for the Rocky Flats effort has been awarded to the Rocky Flats Cleanup Commission. EG&G Rocky Flats, Inc. welcomes the involvement of the TAG group and will provide the group with nonclassified technical information on environmental restoration activities.

Other Activities

The Community Relations Plan Information Coordinator is responsible for addressing citizens' concerns, answering their questions and responding to requests for information. The Communications Department Media Relations Group, in coordination with the Community Relations Plan Information Coordinator, responds to requests and inquiries from the media. All citizen requests and comments and Community Relations Department responses will be documented to ensure that citizen inquiries receive proper attention.

The Information Coordinator is also responsible for ensuring that all relevant materials are filed at the information repositories. Requests should be directed by mail or telephone to the Community Relations Plan Information Coordinator as follows:

Mr. Terry Smith
Community Relations Plan Information Coordinator
EG&G Rocky Flats, Inc.
P O Box 464
Golden, Colorado 80401-0464
(303) 966-2986

EG&G Rocky Flats, Inc. will develop fact sheets on the Rocky Flats Plant and various cleanup activities. These will be made available at Rocky Flats Environmental Monitoring Council meetings and at the information repositories. Fact sheets dealing with public hearing issues will be mailed to individuals and organizations on the Rocky Flats mailing list.

In addition to the fact sheets, the Community Relations Department will publish updates that will be distributed to those on the mailing list and will be available at the information repositories. The updates will describe the progress of the environmental cleanup.

There is also a need to keep the employees at the Rocky Flats Plant informed and to solicit their input regarding cleanup activities. The Community Relations Department will work closely with the Employee Communications Department to provide information to employees through the

plant newspaper, plant announcements and media productions. Employees with specific questions or comments will be directed to the Community Relations Plan Information Coordinator.

The Community Relations Department will arrange site tours for groups or organizations upon their request in accordance with DOE and EG&G Rocky Flats, Inc. tour policies. The Community Relations Department will also schedule briefings for interested groups upon request.

~~This Rocky Flats Plant Interim Community Relations Plan~~ identifies the activities that the Community Relations Department will undertake until community interviews are complete and a final plan is written. The final plan, which will address specific issues raised during the interview process, will be available for implementation in April 1991.

APPENDIX A

IAG List of Documents to Be Available in Information Repositories as Finalized

Primary

RFI/RI Workplans (draft and final)
RFI/RI Reports (draft, all phases and final)
~~CMS/FS Reports (draft, all phases and final)~~
Proposed Plan (draft and final)
IM/IRA Decision Documents (draft,
proposed and final)
Responsiveness Summaries
Corrective Action Decisions/Records of
Decisions (draft and final)
Corrective/Remedial Design Plans
Community Relations Plans
Sampling and Analysis Plan
Plan for Prevention of Contaminant
Dispersion
Background Study Plan
Treatability Study Plan
Workplan to Implement Discharge Limits
for Radionuclides
IM/IRA Implementation Document
Certification of Completion

Secondary

Historical Release Report
Monthly Progress Reports
~~Health & Safety Plan~~
Baseline Risk Assessment Technical
Memoranda
CMS/FS Technical Memoranda
RFI/RI Workplan Technical Memoranda
Priority Proposal for OUs 4 - 10